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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:)	Case No.: BK-19-50102-GS
)	
DOUBLE JUMP, INC.,)	Chapter 7
)	
Debtor(s).)	
_____)	
CHRISTINA W. LOVATO,)	
)	Adversary Proceeding: 21-05032-GS
Plaintiff(s),)	
vs.)	
)	
PRISCILLA AMATO,)	Hearing Date: May 17, 2021
ROBERT AMATO,)	Hearing Time: 9:30 a.m.
PAULA JORDAN,)	
)	
Defendant(s).)	
_____)	

DEFENDANT'S MOTION TO EXTEND TIME TO ANSWER ADVESARY COMPLAINT

Paula Jordan, defendant in the above-referenced adversary proceeding, (the “**Defendant**”), by and through her counsel of record, Schwartz Law, PLLC (“**SL**”), submits the instant motion to extend time to answer adversary complaint (the “**Motion**”). In further support of this Motion, the defendants respectfully state as follows:

JURISDICTION

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and Local Rule 1001(b)(1).¹

¹ Unless otherwise indicated, all chapter and section references are to Title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “**Bankruptcy Code**”). “**Rule**” references are

2. The statutory predicates for the relief requested herein are Sections 105(a) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 7012.

BACKGROUND

3. On January 30, 2019, Double Jump, Inc. and DC Solar Solutions, Inc. (collectively, the “**Debtors**”) filed petitions for relief under chapter 11 of the Bankruptcy Code.²

4. On March 22, 2019, the Court entered an Order converting the Debtors’ bankruptcy cases (the “**Bankruptcy Cases**”) to cases under chapter 7 of the Bankruptcy Code (*Double Jump*, Docket No. 438).

5. On the Same day, the Court entered an Order appointing Christine W. Lovato (the “**Trustee**”) as chapter 7 trustee in the Bankruptcy Cases (*Double Jump*, Docket No. 439).

6. On January 29, 2021, the Trustee initiated the instant adversary proceeding (the “**Adversary**”) by filing a complaint (the “**Adversary Complaint**”) in the Bankruptcy Court for the District of Nevada (Docket No. 1).

7. The final date to file an answer to the complaint in the Adversary is April 2, 2021.

8. In the Adversary, the Trustee alleges claims against the Defendant—the mother of Debtors’ insider Paulette Carpoﬀ—sounding in fraudulent transfer in connection with the Trustee’s claim that the Debtors operated as a ponzi scheme (*Id.*).

9. On April 2, 2021, the Defendant retained SL as counsel in connection with the Adversary.

RELIEF REQUESTED

10. By this Motion, the Defendants seek the entry of an Order extending the time to file an answer to the complaint in the Adversary for 31 days.

ARGUMENT

11. Under Rule 7012: “a complaint is duly served, the defendant shall serve an answer

to the Federal Rules of Bankruptcy Procedure Rules 1001-9037, and “**LR**” reference are to the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court, District of Nevada.

² See *In re Double Jump, Inc.*, No. 19-50102-GS (D. Nev. Bankr. Jan. 30, 2019) (cited *infra* as *Double Jump*) Docket No. 1.

1 within 30 days after the issuance of the summons, except when a different time is prescribed by the
2 court.” Fed. R. Bankr. P. 7012.

3 12. Prior to the SL’s retention, the Defendant sought to secure representation for
4 purposes of the Adversary but were ultimately unsuccessful. During that period of time, the
5 Defendants managed to secure extensions of the time to file an answer to the Adversary Complaint
6 from Plaintiff’s counsel, however, they were unable to retain lasting representation. As a result,
7 the Defendant continued her search and ultimately were successful in retaining SL as counsel in
8 the Adversary.

9 13. SL has been retained today and is being apprised of the relevant facts and issues in
10 the Adversary. As such, the Defendant seeks an extension of the time to file an answer to the
11 Adversary Complaint to allow for SL to review the Adversary and prepare a relevant response to
12 the Trustee.

13 14. No constituency is prejudiced in the case because the instant request is being made
14 prior to the expiration of the time file an answer to the Adversary Complaint.

15 CONCLUSION

16 WHEREFORE, the Defendants pray that this Court enter an order as set forth in the
17 proposed order, attached hereto as **Exhibit A**: (i) granting the Motion; (ii) extending the time to
18 answer the Adversary Complaint; and (iii) granting such other and further relief as is just and
19 proper.

20 DATED: April 2, 2021.

21 Respectfully Submitted,

22 SCHWARTZ LAW, PLLC

23 /s/ Samuel A. Schwartz

24 Samuel A. Schwartz, Esq.
25 601 East Bridger Avenue
Las Vegas, NV 89101

26 *Attorneys for the Defendants*
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EXHIBIT A

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_____)	

**[PROPOSED] ORDER APPROVING DEFENDANTS' MOTION
 TO EXTEND TIME TO ANSWER ADVESARY COMPLAINT**

Upon the motion (the “**Motion**”)¹ of Priscilla Amato, Robert Amato and Paula Jordan, defendants in the above-referenced adversary proceeding, (collectively, the “**Defendants**”), to

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

1 extend time to answer Adversary Complaint and it appearing that proper and adequate notice of the
2 Motion has been given to all parties in interest and that no other or further notice is necessary; it
3 appearing that this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334;
4 and it appearing that this proceeding is a core proceeding pursuant to 28 U.S.C. § 157; and after
5 due deliberation thereon, and all parties appearing having an opportunity to be heard; and good and
6 sufficient cause appearing therefore; it is hereby

7 **ORDERED** that the Motion is **GRANTED**; and it is further

8 **ORDERED** that the time to file an answer to the Adversary Complaint is hereby extended
9 31 days to Monday, May 3, 2021; and it is further

10 **ORDERED** that this Court shall retain jurisdiction to hear and determine all matters arising
11 from the implementation of this order.

12 Respectfully Submitted,

13 SCHWARTZ LAW, PLLC

14 /s/ Samuel A. Schwartz

15 Samuel A. Schwartz, Esq.
16 601 East Bridger Avenue
Las Vegas, NV 89101

17 *Attorneys for the Defendants*
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SUBMISSION TO COUNSEL FOR APPROVAL PURSUANT TO LR 9021

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

_____ The court has waived the requirement set forth in LR 9021(b)(1).

_____ No party appeared at the hearing or filed an objection to the motion.

_____ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

_____ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of this order.

APPROVED:

DISAPPROVED:

FAILED TO RESPOND:

Submitted by:

SCHWARTZ LAW, PLLC

By /s/ Samuel A. Schwartz
Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
601 East Bridger Avenue
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Attorneys for the Defendants

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